

MEMORANDUM

DATE: August 28, 1990

TO: Division File

FROM: Jeff Schoenbacher, DLPC, Collinsville *JS*

SUBJECT: 1631215003-St. Clair-Sauget/Sauget Waste Water Treatment
FOS

On June 14, 1990, this office received an anonymous complaint stating that Sauget Wastewater Treatment Plant (P/Chem Plant) was currently excavating contaminated sludge from two of their stormwater surge lagoons and that the activity had been occurring over the past several days. The complainant's concern was that the material was potentially hazardous, possibly contaminated with PCB's. The complainant further stated that the material was being transported to BFI Landfill in Belleville by Barbier Trucking, a licensed special waste hauler.

Steve Noblitt and I arrived at Sauget WWTP late in the afternoon on June 14, 1990 to determine the validity of the complaint. We observed, at a distance, the excavation of one of the stormwater surge lagoons. According to Nick Mahlandt, IEPA-DWPC, the lagoons in question receive untreated wastewater from industries located in Sauget. Water entering the lagoons does not pass through clarifiers. Its only treatment is by addition of lime. Water remains in the lagoons until the capacity of the P/Chem plant warrants treatment. Our office's concern at that point was that since the water had not been treated, contaminants in the water would settle out in the form of potentially hazardous sludge.

On June 15, 1990, Steve Noblitt and I arrived at the P/Chem Plant and observed excavation activities taking place. We determined that loads were not being disposed of at BFI but at Laidlaw in Belleville. Upon our arrival at the landfill, we instructed the landfill operator to deny the trucks access to the site until we could determine if the necessary permit existed. We phoned our office and learned that no documentation existed on the specific sludge. Laidlaw, however, produced a letter from Ed Bakowski, IEPA-Permit Section, which stated that the sludge in question could be landfilled under Sauget's current filter cake permit. The letter referred to a previous conversation between Mr. Bakowski and Robert Roddy of American Bottoms WWTP. The letter explained that since the stormwater lagoon sludge and the filter cake are "characteristically identical", based on American Bottoms analysis, the material is acceptable under the already existing permit and an additional permit was not necessary. After reviewing the paperwork, we took samples from each of three trucks at the landfill. We also sampled the working area of the landfill where the loads were dumped. Those particular samples were split with Sauget. Sauget samples were analyzed for E.P. Tox metals, not organics or PCB's.

~~CONFIDENTIAL~~

Dz

005449

92 / 1000000

St. Clair - 1631215003
Sauget WWTP

On June 18, 1990, a meeting was held with Mr. Roddy, John Lotzy, (P/Chem Plant Manager), Steve Noblitt and I to discuss the excavation of the lagoons. Mr. Roddy explained that, as discussed with Ed Bakowski, the stormwater sludge and filter cake were characteristically the same.

Mr. Roddy produced a great deal of sample results from over the past year to show that the material was not RCRA hazardous. Samples from the landfill were split with Sauget and analyzed for EP Tox. From the results run by Sauget, no discrepancies were observed regarding the EP Tox levels. We agreed that over the remaining course of the project, the facility would submit to Region 6 the sample results for the remaining sludge on a weekly basis. The analyses run by the plant were limited to EP Tox metals.

On August 23, 1990, this office received the sample results. PCB concentrations for each sample were above the TSCA regulatory level of 50 ppm. The results are as follows:

X201 - Truck Sample - TOTAL PCB's - UG/G : 256 ppm.
X202 - Truck Sample - TOTAL PCB's - UG/G : 212 ppm.
X204 - Landfill - TOTAL PCB's - UG/G : 162 ppm.

Pursuant to 40 CFR 761.60 a)E)5) "All dredged materials and municipal sewage treatment sludge that contain PCB's at concentrations of 50 ppm or greater shall be disposed of:

- (i) In an incinerator which complies with 761.70..
- (ii) In a chemical waste landfill which complies with 761.75; or
- (iii) Upon application, using a disposal method to be approved by the Agency's Regional Administrator in the EPA Region in which the PCB's are located....

On August 24, 1990, Mike Grant and I returned to the lagoons to sample the remaining sludge. Meeting us at the facility were John Lotzy and Robert Roddy. Mr. Roddy was given a copy of the previous sample results and told of the PCB's. Mr. Roddy and Mr. Lotzy then accompanied us to sample the lagoons. Mr. Roddy stated that the sludge removal project was nearly complete. Two samples were taken of the western lagoon, one at the base (X101), and another on the ridge of the lagoon (X102). One sample was taken at the base of the eastern lagoon (X103). For all three samples, three different trowels and gloves were used, and the samples were sealed on site with evidence tape. Mr. Roddy was provided with split samples for each sample taken. During the sampling activities, tyvek suits, boots, gloves, and respirators were utilized. This was due to the strong irritating odor given off from the lagoons.

CONFIDENTIAL

St. Clair - 1631215003
Sauget WWTP

On August 30, 1990, a manifest search was conducted for the material hauled out under the active filter cake permits. The following were the authorization numbers used for the manifest search.

891078 - Milam Landfill - 1630450001
891079 - Chain of Rocks Landfill - 1198010002
891239 - Litchfield/Hillsboro Landfill - 1358150007
790566 - Laidlaw Waste System Inc. - 1638140001

The material was hauled primarily by four trucking firms. Specialty Waste Services Inc., Barbier Trucking, 2 Rivers Trucking, and J C Trucking were all mentioned in the manifest search. However, Specialty Waste Service is the regular disposal service for the filter cake. Due to this fact no sludge loads were counted for this hauler, although there were loads hauled out by Specialty Waste that exceeded the normal volume of filter cake generated by the facility. The following are the approximate number of loads hauled into each landfill:

LANDFILL	# OF LOADS	CUBIC YARDS
Milam	45	675
* Chain of Rocks	287	4,018
Litchfield	104	1,560
Laidlaw	82	1,230

* NOTE: Each load was figured at 15 cubic yards, except for the loads shipped to Chain of Rocks Landfill. These loads were figured at 14 cubic yards, as per the Manifest File Search.

cc: Larry Eastep
cc: Dave Jansen
cc: Greg Richardson
cc: Collinsville DWPC
cc: Collinsville DLPC

005451